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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

In Re: VOLKSWAGEN “CLEAN DIESEL”  
 MARKETING, SALES PRACTICES, AND  
 PRODUCTS LIABILITY LITIGATION

MDL No. 2672 CRB (JSC)

**NOTICE OF MOTION AND MOTION  
 TO REMAND TO STATE COURT**

This Document Relates to:

*State of Alabama v. Volkswagen AG, et al.*,  
 Case No. 3:16-cv-06389 (CRB)

Hearing Date: TBD

Hearing Time: TBD

The Honorable Charles R. Breyer

**NOTICE OF MOTION AND  
 MOTION TO REMAND TO STATE COURT**

The State of Alabama provides notice that it will, and hereby does, move this Court to enter an order that (1) remands this action back to its originating Alabama state court, *Alabama v. Volkswagen AG, et al*, CV-2016-903390 (Jefferson County), for lack of subject matter jurisdiction, *see* 28 U.S.C. § 1447(c), and (2) requires Defendants pay actual expenses and just costs, including attorneys’ fees, incurred as a result of Defendants’ improper removal of Alabama’s action to federal court.

Pursuant to PTO 22, Alabama (a “non-Section 177” State) will flesh out its argument(s) for remand plus appropriate costs/fees on a briefing schedule to be set by this Court at a later date.

Respectfully Submitted,

LUTHER J. STRANGE  
Attorney General of Alabama

By: /s/ Corey L. Maze  
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Dated: December 6, 2016